

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Franklin W. Olin College of Engineering

)
)
)
D.T.E. 01-95

**BOSTON EDISON COMPANY’S, d/b/a NSTAR ELECTRIC,
THIRD SET OF INFORMATION REQUESTS TO
FRANKLIN W. OLIN COLLEGE OF ENGINEERING**

Below are Boston Edison Company’s, d/b/a NSTAR Electric (“Boston Edison”), third set of information requests in this proceeding. For purposes of these information requests, please refer to the instructions provided with the first set of information requests that Boston Edison propounded.

- BE-3-1 With reference to the response to Information Request BE-1-6, please provide any payment in lieu of taxes or tax incremental financing agreements executed between:
- (a) Olin College (“Olin”) and the Town of Needham (“Needham”); and
 - (b) Olin and the Town of Wellesley (“Wellesley”).
- BE-3-2 With reference to Attachment BE-1-7C, please provide documentation regarding any payments that Olin has made to Babson College (“Babson”) under the “Collaboration Agreement” or any other formal or informal agreement for services that Babson has provided to Olin, including, but not limited to temporary and/or permanent electric distribution service. To the extent that the provision of electric service (whether temporary or permanent) by Babson to Olin is pursuant to the Collaboration Agreement, please identify the specific section and language in the Collaborative Agreement that relates to these services. If such provision of service is deemed to an “accommodation,” please define the term accommodation in this context.
- BE-3-3 Please describe any metering equipment that presently exists to record Olin’s consumption of electricity in Needham or Wellesley. Please identify who owns such metering equipment and specifically where it is located. Please provide all monthly meter readings and/or metering data since January 1, 1998. Please identify when such metering equipment was first installed. To the extent that your response is that such metering equipment has never been installed, please explain how Olin’s electricity use is tracked and monitored by Olin and/or Babson, as well as any and all related documentation.

- BE-3-4 With reference to Attachment BE-1-8A, please provide a copy of the August 27, 2001 letter from Don Newell of Wellesley Municipal Light Plant ("WMLP") to Stephen Hannabury of Olin that stated "WMLP's ability to provide temporary electric service to the Olin Campus is contingent upon Olin College receiving approval from the Department of Telecommunications and Energy." (Note: This letter was referenced in a September 17, 2001 email from Gary Babin of WMLP.)
- BE-3-5 With reference to the response to Information Request BE-1-10, please provide a copy of all annual operating budgets produced by Olin since January 1, 1998. (Note: if applicable, the names of any persons and their respective salaries may be redacted.)
- BE-3-6 To the extent not already supplied in response to other information requests, please provide a copy of all contracts, agreements, memoranda, letters, correspondence or other written documentation between Babson and Olin specifically regarding Babson's provision of temporary electric distribution service to Olin.
- BE-3-7 To the extent not already supplied in response to other information requests, please provide a copy of all contracts, agreements, memoranda, letters, correspondence or other written documentation between Babson and Olin specifically regarding Babson's provision of permanent electric distribution service to Olin.
- BE-3-8 Please describe in full how Olin currently compensates, pays for, or otherwise reimburses Babson for electricity consumed by Olin at the Olin campus. Please provide any and all documentation that explains how such amounts are determined and how such payments are made. Please provide a copy of any and all electricity bills in the possession of Olin reflecting electricity bills sent by WMLP to Babson since January 1, 1998.
- BE-3-9 With reference to the response to Information Request BE-1-12, please provide the dates, locations and topics of any and all meetings between Olin and WMLP conducted after August 30, 2001 concerning the subjects identified in Information Request BE-1-8. Please identify the names, titles and responsibilities of all attendees at such meetings for both Olin and WMLP. Please provide any and all meeting minutes from such meetings.
- BE-3-10 With reference to the response to Information Request BE-1-14, please provide a copy of any and all bills, statements or invoices for electricity service

received by Olin from Babson since January 1, 1998. In this response, please include any documents or communications that contain any references to any monetary or non-monetary compensation for such service.

BE-3-11 With reference to the response to Information Request BE-1-17, please provide a specific description of the current and past status of construction at the Olin campus, including the dates that construction was begun on each building, the date that any electrical service was provided to each building, and the date that permanent electrical wiring was installed in each building. Also, please include the monthly electrical usage for each of the above-described buildings beginning from the date such buildings began receiving electric service.

BE-3-12 With reference to the response to Information Request BE-1-18, please provide a specific accounting of the 60,000 square feet of property owned by Olin in Wellesley. Specifically, describe the nature of the property interests (i.e., fee simple, easement, license, etc.), the date such interest was acquired and the exact amount of square feet held in each form of interest. Please provide a map clearly showing each of these interests in a different color.

BE-3-13 With reference to the response to Information Request BE-1-22, please provide a detailed list of every municipal approval sought:

- (a) by Olin, its contractors or agents, from Needham relative to the construction of buildings on the Olin campus;
- (b) by Olin, its contractors or agents, from Wellesley relative to the construction of buildings on the Olin campus;
- (c) by Olin, its contractors or agents, from Needham relative to any needed municipal approvals (e.g., zoning, planning board, finance board);
- (d) by Olin, its contractors or agents, from Wellesley relative to any needed municipal approvals (e.g., zoning, planning board, finance board);
- (e) by Olin, its contractors or agents, from Needham relative to the construction of permanent or temporary electric distribution facilities on, or to serve, the Olin campus; and
- (f) by Olin, its contractors or agents, from Wellesley relative to the construction of permanent or temporary electric distribution facilities on, or to serve, the Olin campus.

BE-3-14 Please confirm that the entire square footage owned in fee by Olin in Wellesley is the approximately 1,000 square foot parcel referenced in that October 31, 2001 deed provided in response to Information Request BE-1-4. If not, please

identify any such addition land owned in fee by Olin in Wellesley and provide a copy of any and all such deeds.

- BE-3-15 With reference to the response to BE-1-33, please provide the specific locations of the construction trailers and trailer units leased by Olin. Please indicate from whom Olin leases these trailers, their exact location (including town) and by what means each of these trailers receives its electrical service.
- BE-3-16 With reference to the response to Information Request BE-1-42 concerning Olin's representation that WMLP serves a "subdivision along the Needham-Wellesley border" (Petition at ¶13), please provide more specific information regarding Olin's understanding of whether Boston Edison has consented to that service from WMLP and the basis for Olin's understanding. Please indicate the specific location and address(es) of that subdivision. In addition, please identify any other electricity customers that Olin believes are located in Needham that are served by WMLP, where Boston Edison has not consented to such service by WMLP. Please provide all related documentation that forms the basis for Olin's belief.
- BE-3-17 With respect to the electricity delivered through Babson as temporary electric service to the Olin campus, please indicate for how long those facilities would be sufficient to meet Olin's electricity requirements. In responding to this question, please specifically identify any limitations such temporary facilities have in supplying Olin's electricity requirements safely, reliably and/or economically. Please identify the date such temporary facilities must be replaced by permanent facilities in order for Olin to meet its current planning schedule.
- BE-3-18 Please indicate whether, in the event Olin were to be authorized by the Department of Telecommunications and Energy to take electricity service from WMLP, Olin believes it would be permitted by WMLP to engage in a joint procurement effort for electricity with Babson (and if not, why not).
- BE-3-19 With reference to the response to Information Request BE-1-32, please provide a map of all of Babson's property in Wellesley and Needham, specifically identifying: (i) all buildings, facilities, houses, and dormitories; and (ii) for each of the buildings, facilities, houses, and dormitories, whether the property is served by WMLP or Boston Edison. Please also indicate when service to Babson was commenced at each of these locations (and by whom).
- BE-3-20 With reference to Attachment BE-1-5B, please explain the meaning of the term "ISSUED FOR CONSTRUCTION." Please identify for all electric

distribution facilities set forth on Attachment BE-1-5A and Attachment BE-1-5B whether such facilities have already been constructed and, if so, when. To the extent such facilities have not already been constructed, please indicate when such construction is scheduled to occur.

BE-3-21 With reference to Attachment BE-1-5C, please explain what is the "Main Site Package" as indicated in the one line diagram on that attachment. Please specify all such facilities (included as part of the "Main Site Package") and when they were installed or are planned to be installed. For each of these facilities, please explain how they relate to either temporary service or permanent service at the Olin campus.

BE-3-22 Please indicate whether, prior to responding to information requests in this proceeding, Olin had provided Boston Edison a copy of the various diagrams, drawings and plans attached to Olin's response to Information Request BE-1-5.

BE-3-23 With respect to the response to Information Request BE-1-7, there is attached a December 15, 2000 email from Stephen Hannabury indicating a decision by Olin to "obtain Olin College permanent power from [WMLP]." The email also indicates that Boston Edison would be informed of this decision "today or Monday." Please indicate whether and when that communication was made, the name of the person or persons at Olin who made that communication, to whom at Boston Edison that communication was made and any related documentation.

Dated: February 11, 2002